

# Exhibit 7



June 18, 2024

Fish & Richardson P.C.  
1000 Maine Avenue, S.W.  
Suite 1000  
Washington, DC 20024  
202 783 5070 main  
202 783 2331 fax

**VIA E-MAIL**

Russ August & Kabat  
12424 Wilshire Boulevard  
12th Floor  
Los Angeles, CA 90025  
Phone: 310-826-7474

Thad Kodish  
Principal  
[tkodish@fr.com](mailto:tkodish@fr.com)  
+1 404-724-2792 direct

Parker Bunt & Ainsworth  
100 E Ferguson  
Suite 418  
Tyler, TX 75702  
Phone: 903-531-3535

**Re: Headwater Research LLC v. Samsung Electronics Co., Ltd. et al., Case No. 2:23-cv-00641 (E.D. Tex.)**

Dear Counsel:

Samsung Electronics Co., Ltd. (“**Samsung**”) has filed an *inter partes* review (IPR) petition (IPR2024-01051) with the Patent Trial and Appeal Board (PTAB) to address the validity of claims 1-30 of U.S. Patent No. 8,639,811 (“**the ’811 Patent**”). The tables in attached Appendix A list all grounds, challenged claims, and references asserted in IPR2024-01051.

I write to inform you that Samsung hereby stipulates that, if the PTAB institutes IPR2024-01051, Samsung agrees not to pursue the same grounds (listed in Appendix A below) in the district court litigation. *Apple, Inc. v. SEVEN Networks, LLC*, IPR2020-00156, Paper 10 at 19 (June 15, 2020); *see also Sand Revolution II, LLC v. Continental Intermodal Group-Trucking LLC*, IPR2019-01393, Paper 24 at 12 (June 16, 2020).

Sincerely,

A handwritten signature in black ink, appearing to read "Thad Kodish".

Thad Kodish

Attorney for Samsung Electronics Co., Ltd.



Page 2

### Appendix A – Grounds and Prior Art References Used in IPR2024-01051

Ground	Claim(s)	§103
1A	<b>1, 3, 6, 8-11, 14, 19-20</b>	Rao
1B	<b>2</b>	Rao-Panpaliya
1C	<b>4, 13, 21, 23, 25</b>	Rao-Jones
1D	<b>17</b>	Rao-Jones-Jajoo
1E	<b>22</b>	Rao-Jones-Cole
1F	<b>5</b>	Rao-Montemurro
1G	<b>7</b>	Rao-Akhtar
1H	<b>18</b>	Rao-Ramesh
1I	<b>12, 15-16, 26-27, 29-30</b>	Rao-Freund
1J	<b>28</b>	Rao-Freund-Bedi
2	<b>1, 24</b>	Rao-Pregont-Jones

### List of References

Reference Name	Details
Rao	U.S. Pat. App. Pub. No. 2006/0039354
Panpaliya	U.S. Pat. No. 8,400,491
Jones	U.S. Pat. No. 8,285,850
Jajoo	U.S. Pat. App. Pub. No. 2008/0162981
Cole	U.S. Pat. App. Pub. No. 2008/0080458
Montemurro	U.S. Pat. App. Pub. No. 2009/0207817



Page 3

Reference Name	Details
Akhtar	U.S. Pat. App. Pub. No. 2009/0185527
Ramesh	U.S. Pat. App. Pub. No. 2009/0228951
Freund	U.S. Pat. No. 5,987,611
Bedi	U.S. Pat. App. Pub. No. 2010/0281154
Pregont	U.S. Pat. App. Pub. No 2007/0032230